

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
DOCKET NO. 5:19-cr-00022-MOC-DSC

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>JOINT MOTION FOR PRETRIAL</b>
	)	<b>STATUS CONFERENCE</b>
<b>GREG E. LINDBERG,</b>	)	<b>AND TO STAY PRETRIAL</b>
<b>JOHN D. GRAY,</b>	)	<b>MOTIONS DEADLINE</b>
<b>JOHN V. PALERMO, JR, and</b>	)	
<b>ROBERT CANNON HAYES,</b>	)	
	)	
Defendants.	)	

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**NOW COME** defendants, by and through counsel of record, and hereby jointly move that the Court convene a pretrial status conference to discuss the scheduling of this matter, including the continuing of the pending July 15, 2019 calendar call, and stay the pending June 17, 2019 pretrial motions deadline pending an updated schedule to be decided at the pretrial status conference. In accordance with LCrR 47.1(b), defendants certify that they have conferred with counsel for the United States prior to the filing of this motion and report that counsel to the United States consents to this motion.

1. Due to the volume of the discovery that has already been produced, the additional volume of discovery anticipated to be produced, the timing of these rolling productions, and to allow for orderly scheduling of trial, the parties respectfully move that the Court convene a pretrial status conference to discuss continuing the pending July 15, 2019 calendar call and identifying a preemptive date for trial to commence.

2. The parties further move that the pending June 17, 2019 pretrial motions deadline be stayed pending an updated schedule to be decided at the pretrial status conference.

3. The parties further move that the Court find, pursuant to 18 U.S.C. § 3161(h)(7), that any period of delay resulting from a continuance granted in response to this motion be excluded on the basis that the ends of justice served by such a continuance outweighs the best interest of the public and the defendants in a speedy trial because that the failure to grant such a continuance would deny counsel for the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, in light of the volume of discovery produced, the additional volume of discovery anticipated to be produced, and the timing of these rolling productions. See 18 U.S.C. § 3161(h)(7)(iv).

4. All counsel for the defendants are available on June 18 (in the morning), 19 (any time), or 20 (any time), 2019, if there is a time during those days that is convenient for the Court.

**WHEREFORE**, defendants jointly move the Court to convene a pretrial status conference to discuss the scheduling of this matter, including the continuing of the pending July 15, 2019 calendar call, stay the pending June 17, 2019 pretrial motions deadline pending an updated schedule to be decided at the pretrial status conference, and exclude any period of delay occasioned by such a continuance.

Respectfully submitted this 23<sup>rd</sup> day of May, 2019.

/s/ Anne M. Tompkins

Anne M. Tompkins  
N.C. State Bar No. 19511  
**CADWALADER, WICKERSHAM & TAFT LLP**  
227 West Trade St.  
Charlotte, NC 28202  
anne.tompkins@cwt.com  
*Attorney for Defendant Greg E. Lindberg*

/s/ Jack M. Knight, Jr.

Jack M. Knight, Jr.  
N.C. State Bar No. 21145  
John H. Cobb  
N.C. State Bar No. 17052  
Patrick Andrew Doerr  
N.C. State Bar No. 50673  
**WINSTON & STRAWN LLP**  
300 S. Tryon Street  
16th Floor  
Charlotte, NC 28202  
jknight@winston.com  
jcobb@winston.com  
pdoerr@winston.com  
*Attorneys for Defendant John D. Gray*

/s/ Brian Cromwell

Brian Cromwell  
N.C. State Bar No. 23488  
Sarah Fulton Hutchins  
N.C. State Bar No. 38172  
**PARKER POE ADAMS & BERNSTEIN LLP**  
401 S. Tryon St., Suite 3000  
Charlotte, NC 28202  
briancromwell@parkerpoe.com  
sarahhutchins@parkerpoe.com  
*Attorneys for Defendant John V. Palermo, Jr*

/s/ Kearns Davis

Kearns Davis

N.C. State Bar No. 22014

Daniel D. Adams

N.C. State Bar No. 51806

Julia C. Ambrose

N.C. State Bar No. 37534

Shana L. Fulton

N.C. State Bar No. 27836

**BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD LLP**

230 N. Elm St., Suite 2000

Greensboro, NC 27401

kdavis@brookspierce.com

dadams@brookspierce.com

jambrose@brookspierce.com

sfulton@brookspierce.com

*Attorneys for Defendant Robert Cannon Hayes*